

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEXINGTON INSURANCE COMPANY,	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 02-CV-4435
	:	
v.	:	
	:	
DAVID FORREST, et al.,	:	(Hon. Anita B Brody)
	:	
Defendants.	:	

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2004, upon consideration of the Motion of Neil G. Epstein, Esquire, it is hereby ORDERED that Sanford Louis Michelman, Esquire, Mona Z. Hanna, Esquire, and Jeffrey D. Farrow, Esquire, are ADMITTED *pro hac vice* as co-counsel for all purposes for defendant Martin Fink in the above-captioned civil action.

BY THE COURT:

\_\_\_\_\_

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEXINGTON INSURANCE COMPANY,	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 02-CV-4435
	:	
v.	:	
	:	
DAVID FORREST, et al.,	:	(Hon. Anita B Brody)
	:	
Defendants.	:	

**MOTION FOR THE ADMISSION *PRO HAC VICE* OF  
SANFORD LOUIS MICHELMAN, MONA Z. HANNA AND JEFFREY D. FARROW**

Neil G. Epstein, Esquire, counsel for defendant Martin Fink, hereby moves the Court to admit *pro hac vice* Sanford Louis Michelman, Esquire, Mona Z. Hanna, Esquire, and Jeffrey D. Farrow, Esquire, as co-counsel for defendant Martin Fink in the above-captioned civil action, and in support thereof states as follows:

1. Since the date of my admission in 1969 to the present, I have been a member in good standing of the Bar of the Commonwealth of Pennsylvania. My Pennsylvania Attorney Identification Number is 09776. I am admitted to practice before the United States Court of Appeals for the Third Circuit and before the United States District Court for the Eastern District of Pennsylvania.

2. I am a litigation member of the law firm of Eckert Seamans Cherin & Mellott, LLC. My business address is 1515 Market Street, 9th Floor, Philadelphia, PA 19102, and my office telephone number is (215) 851-8408.

3. Eckert Seamans Cherin & Mellott, LLC has been retained to serve as local counsel for defendant Martin Fink.

4. I move for the admission *pro hac vice* of Sanford Louis Michelman, Esquire, Mona Z. Hanna, Esquire, and Jeffrey D. Farrow, Esquire, all of the State of California, who will serve as co-counsel for defendant Martin Fink in this civil action.

5. Mr. Michelman is a member of the law firm of Michelman & Robinson, L.L.P., 15760 Ventura Boulevard, Suite 500, Encino, California 91436. His business telephone is (818) 783-5522. Mr. Michelman was admitted to the practice of law in the State of California in 1995. I am advised that he is an attorney in good standing of the bar of that state and is qualified and licensed to practice in that jurisdiction.

6. Ms. Hanna is member of the firm of Michelman & Robinson, L.L.P., 4 Hutton Centre Drive, Suite 300, Santa Ana, California 92707. Her business telephone is (714) 557-7990. Ms. Hanna was admitted to the practice of law in the State of California in 1987. I am advised that she is an attorney in good standing of the bar of that state and is qualified and licensed to practice in that jurisdiction.

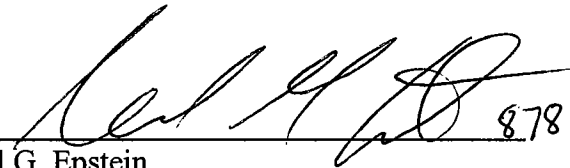
7. Mr. Farrow is associated with the law firm of Michelman & Robinson, L.L.P., 4 Hutton Centre, Suite 300, Santa Ana, California 92707. His business telephone is (714) 557-7990. Mr. Farrow was admitted to the practice of law in the State of California in 1995. I am advised that he is an attorney in good standing of the bar of that State and is qualified and licensed to practice in that jurisdiction.

8. Mr. Michelman's, Ms. Hanna's and Mr. Farrow's Verifications in support of this Motion are attached hereto as Exhibits A, B and C, and are incorporated here by reference as if fully set forth.

9. Eckert Seamans Cherin & Mellott, LLP will remain and act as counsel of record in this litigation, in accordance with Local Rule 83.5.2 of this Court.

WHEREFORE, Neil G. Epstein, Esquire, respectfully requests this Court to admit *pro hac vice* Sanford Louis Michelman, Esquire, Mona Z. Hanna, Esquire, and Jeffrey D. Farrow, Esquire, as co-counsel for defendant Martin Fink for all purposes in the above-captioned civil action.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Neil G. Epstein', is written over a horizontal line. To the right of the signature, the number '878' is handwritten.

Neil G. Epstein  
Attorney I.D. No. 09776  
ECKERT SEAMANS  
CHERIN & MELLOTT, LLC  
1515 Market Street, 9th Floor  
Philadelphia, PA 19102  
(215) 851-8408  
Attorneys for Defendant Martin Fink

Dated: July 16, 2004

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEXINGTON INSURANCE COMPANY,	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 02-CV-4435
	:	
v.	:	
	:	
DAVID FORREST, et al.,	:	(Hon. Anita B Brody)
	:	
Defendants.	:	

**VERIFICATION OF SANFORD LOUIS MICHELMAN**

1. I am a member of the law firm of Michelman & Robinson, L.L.P., 15760 Ventura Boulevard, Suite 500, Encino, California 91436. My business telephone is (818) 783-5522.

2. I am a 1995 graduate of Southwestern University School of Law.

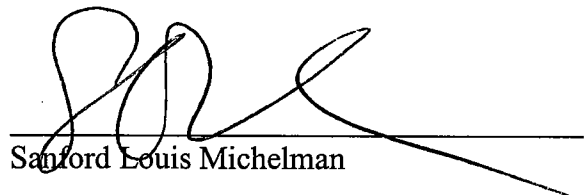
3. I have been licensed to practice law in the State of California since 1995.

I am also admitted to practice before the United States District Courts for the Central and Southern Districts of California and the United States Court of Appeals for the Ninth Circuit.

4. I am, and always have been, a member in good standing of the Bar of the State of California and of all Courts to which I have been admitted.

5. Defendant Martin Fink has requested that I serve as his counsel in any proceedings related to this civil action.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 7/17/04.

  
Sanford Louis Michelman

**IN THE UNITED STATES DISTRICT COURT  
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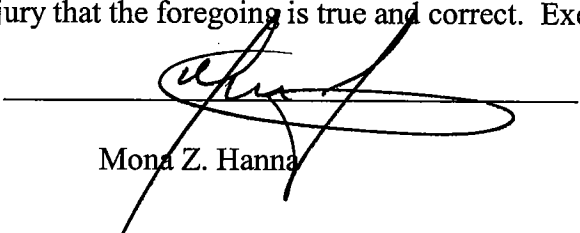
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Plaintiff,	:	NO. 02-CV-4435
	:	
v.	:	
	:	
DAVID FORREST, et al.,	:	(Hon. Anita B Brody)
	:	
Defendants.	:	

**VERIFICATION OF MONA Z. HANNA**

1. I am a member of the law firm of Michelman & Robinson, L.L.P., 4 Hutton Centre Drive, Suite 300, Santa Ana, California 92707. My business telephone is (714) 557-7990.
2. I am a 1987 graduate of University of California, Hastings College of Law.
3. I have been licensed to practice law in the State of California since 1987. I am also admitted to practice before the United States District Courts for the Central, Eastern and Southern Districts of California and the United States Court of Appeals for the Ninth Circuit.
4. I am, and always have been, a member in good standing of the Bar of the State of California and of all Courts to which I have been admitted.
5. Defendant Martin Fink has requested that I serve as his counsel in any proceedings related to this civil action.

I declare under penalty of perjury that the foregoing is true and correct. Executed

on July 14, 2004

  
Mona Z. Hanna

**EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
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Plaintiff,	:	NO. 02-CV-4435
	:	
v.	:	
	:	
DAVID FORREST, et al.,	:	(Hon. Anita B Brody)
	:	
Defendants.	:	

**VERIFICATION OF JEFFREY D. FARROW**

1. I am associated with the law firm of Michelman & Robinson, L.L.P., 4 Hutton Centre, Suite 300, Santa Ana, California 92707. My business telephone is (714) 557-7990.

2. I am a 1995 graduate of Southwestern University School of Law.

3. I have been licensed to practice law in the State of California since 1995.

I am also admitted to practice before the United States District Courts for the Central and Southern Districts of California and the United States Court of Appeals for the Ninth Circuit.

4. I am, and always have been, a member in good standing of the Bar of the State of California and of all Courts to which I have been admitted.

5. Defendant Martin Fink has requested that I serve as his counsel in any proceedings related to this civil action.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 14, 2004.

  
Jeffrey D. Farrow

**EXHIBIT C**

**CERTIFICATE OF SERVICE**

I, Neil G. Epstein, hereby certify that on July 16, 2004, one true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* was served via United States First-Class Mail, postage prepaid, upon the following:

Edward P. Krugman, Esquire  
Cahill Gordon & Reindel  
80 Pine Street  
New York, NY 10005  
*Attorney for Plaintiff Lexington Insurance Company*

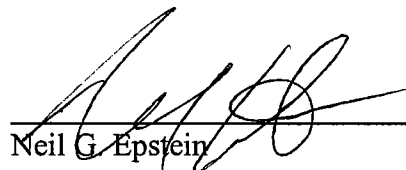
Glenn F. Rosenblum, Esquire  
Montgomery, McCracken, Walker  
& Rhoads, LLP  
123 South Broad Street  
Philadelphia, PA 19109  
*Attorney for Plaintiff Lexington Insurance Company*

Edward M. Dunham, Jr., Esquire  
Duane Morris LLP  
One Liberty Place  
Philadelphia, PA 19103  
*Attorney for Defendant David Forrest*

James J. Rohn, Esquire  
Conrad O'Brien Gellman & Rohn PC  
1515 Market Street, 16<sup>th</sup> Floor  
Philadelphia, PA 19102  
*Attorney for Defendant  
T. Beauclerc Rogers, IV*

David L. Pennington, Esquire  
Harvey, Pennington Ltd.  
1835 Market Street, 29<sup>th</sup> Floor  
Philadelphia, PA 19103  
*Attorney for Defendant Tarlo Lyons*

Alexander Kerr, Esquire  
McCarter & English, LLP  
1735 Market Street, Suite 700  
Philadelphia, PA 19103  
*Attorney for Defendant New Beginnings Enterprises LLC*

  
Neil G. Epstein 878